

# EXHIBIT 4

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

\_\_\_\_\_  
)  
CITY OF SPOKANE, a )  
municipal corporation )  
located in the County of )  
Spokane, State of )  
Washington, ) Case No.  
2:15-cv-00201-SMJ  
Plaintiff, )  
)  
-vs- )  
)  
MONSANTO COMPANY, et al., )  
)  
Defendants. )  
\_\_\_\_\_ )

SHOOK HARDY & BACON  
2001 MARKET STREET - SUITE 3000  
PHILADELPHIA, PENNSYLVANIA 19103  
DECEMBER 18, 2019  
10:14 A.M.

VIDEOTAPED DEPOSITION OF  
LISA A. RODENBURG, PH.D.

REPORTED BY:  
DEBRA SAPIO LYONS, RDR, CRR, CRC, CCR, CLR, CPE  
JOB NO. 173395

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4  
5 December 18, 2019

6 Videotaped deposition of Lisa A.

7 Rodenburg, Ph.D., held at the offices of Shook  
8 Hardy & Bacon L.L.P., 2001 Market Street -  
9 Suite 3000, Philadelphia, Pennsylvania 19103,  
10 before Debra Sapio Lyons, a Registered Diplomat  
11 Reporter, a Certified Realtime Reporter, a  
12 Certified Realtime Captioner, a Certified  
13 LiveNote Reporter, an Approved Reporter of the  
14 United States District Court for the Eastern  
15 District of Pennsylvania, a Certified Court  
16 Reporter of the State of New Jersey, a Notary  
17 Public of the States of New Jersey, New York and  
18 the Commonwealth of Pennsylvania.  
19  
20  
21  
22  
23  
24  
25

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17 TSG REPORTING, INC.

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1 Lisa A. Rodenburg, Ph.D.

2 THE VIDEOGRAPHER: This is the start  
3 of Tape Labeled Number 1 of the videotaped  
4 deposition of Lisa Rodenburg in the matter  
5 of City of Spokane, et al. v. Monsanto  
6 Company, et al. in the United States  
7 District Court, Eastern District of  
8 Washington, Case Number 15-CV-00201-SMH.

9 This deposition is being held at  
10 2001 Market Street, Philadelphia,  
11 Pennsylvania on December 18th, 2019 at  
12 approximately 10:15 a.m.

13 My name is Crystal Strawbridge from  
14 TSG Reporting, Inc. and I'm the legal video  
15 specialist. The court reporter is Debra  
16 Lyons in association with TSG Reporting.

17 Will counsel, please, introduce  
18 yourselves.

19 MR. GOUTMAN: We'll waive  
20 introduction of counsel.

21 THE VIDEOGRAPHER: Okay. Will the  
22 court reporter, please, swear in the  
23 witness?

24 LISA A. RODENBURG, PH.D., having  
25 been first duly sworn, was examined and

1 Lisa A. Rodenburg, Ph.D.

2 A. You said 2009.

3 Q. Okay. 209, yeah. There are not  
4 that many congeners, even I know that.

5 And you cite 11 and 209 because  
6 they're frequently found as byproduct  
7 congeners in pigments; correct?

8 A. That is one reason, yes.

9 Q. Okay. What's -- what are the  
10 other reasons?

11 A. 209 -- I'm trying to think. So  
12 209 has been found in inorganic pigments and  
13 organic pigments. I can't think of anything  
14 else at the point -- at this moment. So,  
15 yeah, they've been found in pigments.

16 Q. And we spent a lot of time at the  
17 last deposition going through Hu and  
18 Hornbuckle and their paper identifying  
19 numerous other congeners found in pigments;  
20 correct?

21 A. Correct.

22 Q. And we don't have to do that  
23 again, do we?

24 A. I don't think so.

25 Q. There's another paper that I found

1 Lisa A. Rodenburg, Ph.D.

2 in a sample.

3 BY MR. GOUTMAN:

4 Q. So your answer is yes?

5 A. Yes.

6 Q. In addition, of course, there are  
7 other manufacturing processes that produce  
8 byproduct PCBs. You're aware of that; right?

9 A. Yes.

10 Q. And the EPA in 1983, when they  
11 passed regulations on this, listed some 200  
12 manufacturing processes that could potentially  
13 create byproduct PCBs. You're aware of that?

14 A. Yes.

15 Q. And that list was collected in a  
16 paper that Mr. Coghlan, one of Plaintiff's  
17 experts, was brought to our attention, which  
18 I'm about to show you.

19 A. Okay.

20 MR. GOUTMAN: We'll mark this as  
21 Exhibit 9.

22 (Exhibit Rodenburg-9, multipage  
23 document entitled Pollution Prevention and  
24 Management Strategies for Polychlorinated  
25 Biphenyls in the New York/New Jersey

1 Lisa A. Rodenburg, Ph.D.

2 River watershed; correct?

3 A. That is correct.

4 Q. Would you agree that combustion  
5 reactions can create PCBs?

6 A. Yes.

7 MR. GOUTMAN: Why don't we go to  
8 Ishikawa. Just give me all of those.

9 (Exhibit Rodenburg-10, multipage  
10 document entitled PCB decomposition and  
11 formation in thermal treatment of plant  
12 equipment, is marked for identification.)

13 BY MR. GOUTMAN:

14 Q. We've marked as Exhibit 10 a paper  
15 by Ishikawa, et al. called, "PCB decomposition  
16 and formation in thermal treatment of plant  
17 equipment."

18 Are you familiar with this paper?

19 A. It's not ringing a bell, no.

20 Q. Okay. What this papers shows, and  
21 you can take a second and read it, I'm just  
22 going to direct your attention to a few  
23 passages, but they basically -- excuse me for  
24 coughing -- they basically ran combustion  
25 experiments, just looking at the top of the

1 Lisa A. Rodenburg, Ph.D.

2 An Update, is marked for identification.)

3 BY MR. GOUTMAN:

4 Q. And you've seen this document  
5 before; correct?

6 A. Yes.

7 Q. We've shown you, I think, at both  
8 of your earlier depositions, at least one of  
9 them.

10 A. Yes.

11 Q. And this is a transcription of a  
12 webinar you gave on September 25, 2007, "PCBs:  
13 An Update"; correct?

14 A. 2017.

15 Q. Did I -- what did I say?

16 A. 2007.

17 Q. Wow. It's a bad day here. Sorry.  
18 I had a cold and my brain is not functioning  
19 as clearly as it usually does. I'm usually  
20 sharp as a tack, believe me.

21 A. I know.

22 Q. Okay. In this webinar you said  
23 some things that I'd like to show you. If you  
24 turn to Page 53 -- 52 actually --

25 A. 52.

1 Lisa A. Rodenburg, Ph.D.

2 Q. -- if you can, read from Line 16  
3 down to Page 53, Line 10. Read it aloud for  
4 the record.

5 MR. LAND: And slowly.

6 THE WITNESS: Was I slow enough last  
7 time?

8 "And so this is a problem for the  
9 City of Spokane, or the County of Spokane,  
10 because they can" --

11 BY MR. GOUTMAN:

12 Q. I'm sorry. Let me interrupt.  
13 Start from Line 13.

14 A. 13.

15 Q. The entire paragraph.

16 A. Oh, sure.

17 "And the one PCB congener that is  
18 now dominant in the effluent is PCB-11, which  
19 is the one that comes from pigments. And so  
20 this is a problem for the City of Spokane, or  
21 the County of Spokane, because they can go  
22 after the Aroclor-type sources. They're one  
23 of the cities suing Monsanto, for example.  
24 They can try to remove all transformers and  
25 capacitors. You know, they can try to do a

1 Lisa A. Rodenburg, Ph.D.

2 lot of things to remove the Aroclor-type PCBs  
3 from their system, but that's not their main  
4 problem. Their main problem is PCB-11 for  
5 pigments; and what are they going to do about  
6 that. That's quite difficult, because people  
7 are always going to use color-printed, you  
8 know, paper; and they're always going to wear  
9 printed clothing. And they're always going to  
10 have these PCB -- these pigments in their  
11 system. There's not much that Spokane County  
12 can do about their worst PCB problem."

13 Q. So when you gave this webinar --  
14 by the way, what was the purpose of this  
15 webinar and what was the audience?

16 A. It was a continuing education  
17 project run by Rutgers.

18 Q. Okay. So you were there as an  
19 educator?

20 A. Yes.

21 Q. And when you lecture as an  
22 educator, you attempt to give accurate  
23 information; correct?

24 A. Yes.

25 Q. At -- as of September 25, 2017,

1 Lisa A. Rodenburg, Ph.D.

2 Kentucky, Minnesota, or Florida, it's all  
3 mixed together?

4 A. Well, I'm assuming your samples  
5 are all tagged with latitude and longitude.

6 Q. Yeah, I understand that, but in  
7 the PMF analysis in this hypothetical, you're  
8 mixing them all together, you're including  
9 them in the same analysis, right, and you're  
10 identifying factors; correct?

11 A. Yes.

12 Q. So isn't it true that geographic  
13 heterogeneity might limit the extent to which  
14 a PMF analysis can give you useful  
15 information?

16 MR. LAND: Objection, misleading,  
17 incomplete hypothetical.

18 THE WITNESS: As long as your  
19 samples are tagged with latitude and  
20 longitude, you can back out the spacial  
21 information, so I don't think it limits  
22 you.

23 BY MR. GOUTMAN:

24 Q. Okay. Going back, you put -- you  
25 put this -- load this data into your computer



1 Lisa A. Rodenburg, Ph.D.

2 and you ask your computer model to generate  
3 factors, what's called factors; correct?

4 A. Correct.

5 Q. And you compared those factors to  
6 certain Aroclors; correct?

7 A. Correct.

8 Q. And in your report you identify  
9 specifically your methodology, and you -- if I  
10 can find it -- I believe compared it to 1016,  
11 Aroclor 1242, 1248, 1254, and 1260; correct?

12 A. Correct.

13 Q. So that was your methodology. And  
14 you did not compare the factors to byproduct  
15 profiles; correct?

16 A. When I found factors that were not  
17 similar to any of the Aroclors, I did compare  
18 them with what I knew about inadvertent PCBs.

19 Q. That wasn't my question and I  
20 think you know it wasn't my question.

21 You did not design this by -- by  
22 comparing by way of PMF analysis any  
23 non-Aroclor profiles, you used only Aroclor  
24 profiles; correct?

25 MR. LAND: Objection, misleading,

1 Lisa A. Rodenburg, Ph.D.

2 incomplete hypothetical.

3 THE WITNESS: The PMF analysis just  
4 spits out the fingerprints. It has nothing  
5 to do with whether things are Aroclors or  
6 not. And then I took the fingerprints and  
7 compared them with Aroclors.

8 BY MR. GOUTMAN:

9 Q. So the answer is, yes, you did  
10 not -- you did not take what the computer spat  
11 out, the factors, right, and compare them to  
12 byproduct profiles?

13 MR. LAND: Objection, misleading.

14 THE WITNESS: I did. When -- when  
15 the factors did not look like Aroclors, I  
16 then went and compared them with what I  
17 knew about inadvertent byproduct PCB  
18 fact -- fingerprints.

19 BY MR. GOUTMAN:

20 Q. Which byproduct fingerprint --  
21 prints did you identify and use and in what  
22 publications did you take them from?

23 A. There's a paper by Nakano where he  
24 has fingerprints for PCBs in silicone  
25 products. I used that.

1 Lisa A. Rodenburg, Ph.D.

2 Q. What was the R2 value for that?

3 A. I don't remember.

4 Q. So why didn't you submit that  
5 analysis in your report?

6 A. I did it visually. I didn't do it  
7 in terms of actual numbers.

8 Q. Well, this is my question.  
9 In terms of actual numbers --

10 A. Okay.

11 Q. -- so you can generate an R2  
12 value, the quantitative result that scientists  
13 can look at instead of just sort of trying to  
14 peer subjectively in your head, okay, did you  
15 calculate any R2 values for any of the factors  
16 based upon byproduct profiles found in the  
17 literature?

18 A. No.

19 MR. LAND: Objection, misleading.

20 THE WITNESS: Sorry.

21 BY MR. GOUTMAN:

22 Q. And that is something you could  
23 have done; correct?

24 MR. LAND: Objection, incomplete  
25 hypothetical.

1 Lisa A. Rodenburg, Ph.D.

2 THE WITNESS: In some cases, yes.

3 BY MR. GOUTMAN:

4 Q. What would have prevented you from  
5 doing that?

6 A. The byproduct PCB signatures vary  
7 quite a bit from what I've seen in the  
8 literature, so it would be difficult to know  
9 which ones to use. There are many published  
10 ones.

11 Q. Why not use all of them? What  
12 would prevent you from doing that?

13 A. That would be possible.

14 Q. And, in fact, there are byproduct  
15 profiles for numerous products that you are  
16 not even aware of, for example, the products  
17 that were listed in Page 100 of Exhibit 9. Do  
18 you recall that?

19 MR. LAND: Objection, compound,  
20 vague.

21 BY MR. GOUTMAN:

22 Q. Correct?

23 MR. LAND: What are you asking  
24 there?

25 MR. GOUTMAN: What am I asking? I'm

1 Lisa A. Rodenburg, Ph.D.

2 asking the question I asked.

3 BY MR. GOUTMAN:

4 Q. In fact, there are by -- there are  
5 byproduct profiles for numerous products that  
6 are -- that you are not aware of that are, for  
7 example, listed in products in Exhibit 9 that  
8 we discussed in some detail; correct?

9 MR. LAND: Objection, vague,  
10 incomplete hypothetical.

11 THE WITNESS: Presuming that the  
12 products listed in that table really do  
13 have PCBs in them, then, yes, there may be  
14 other fingerprints that I'm not aware of.

15 BY MR. GOUTMAN:

16 Q. And for purposes of preparing your  
17 report, you did not go out and research any of  
18 these products that are listed in Exhibit 9 to  
19 determine what, if any, information there is  
20 on byproduct PCB profiles in these products;  
21 correct?

22 A. Only for the pigments in the -- in  
23 the silicones.

24 Q. And you certainly didn't compare  
25 them to any byproduct profiles from the

1 Lisa A. Rodenburg, Ph.D.

2 incineration literature which we've already  
3 discussed you were not familiar with; correct?

4 A. I am familiar with some of the  
5 incineration literature. I have some  
6 knowledge of what the fingerprints look like  
7 out of incinerators, and so I had -- I had  
8 that in mind when I was looking at the  
9 fingerprints, but I did not numerically  
10 compare them, no.

11 Q. The only thing you numerically  
12 compared the factors to were Aroclors;  
13 correct?

14 A. Correct.

15 Q. And then after comparing them, you  
16 used three criteria according to Page 14 of  
17 your report; correct?

18 A. I'm sorry. What was the question  
19 again?

20 Q. You used three criteria, did you  
21 not, for determining whether the PMF  
22 identified a non-Aroclor source; correct?

23 A. Yes.

24 Q. And the first one is that it  
25 should not resemble any Aroclors; right?

1 Lisa A. Rodenburg, Ph.D.

2 Q. I'm at Page 133, and we'll do this  
3 the hard way. Okay?

4 Question Page -- Line 3:

5 "Let me ask it this way -- in this  
6 way -- let me ask it this way. I couldn't  
7 look in a handbook, textbook, or peer-reviewed  
8 article which will tell me that a sample with  
9 an R2 value of .5 is either weather -- a  
10 weathered Aroclor, something that never was an  
11 Aroclor, or something that always was an  
12 Aroclor?"

13 And your answer was what --

14 A. Correct.

15 Q. -- and that is true today;  
16 correct?

17 A. Correct.

18 Q. And I asked you:

19 "If I were to tell you that in my  
20 opinion the upper cutoff limit of .8 should be  
21 .9, how could you disprove that?"

22 And what was your answer under  
23 oath?

24 A. "I couldn't disprove it."

25 Q. And that is true today; correct?

1 Lisa A. Rodenburg, Ph.D.

2 A. Correct.

3 Q. And then I asked:

4 "If I were to say the lower cutoff  
5 should be -- instead of .4, it should be .5,  
6 .6, .7, how would you scientifically disprove  
7 that?"

8 And your answer was?

9 A. "I can't disprove it."

10 Q. And that answer is true today?

11 A. Yes.

12 Q. And am I correct that these  
13 cutoffs that you used here have never been  
14 subjected to a peer review in a peer-reviewed  
15 journal?

16 A. Correct.

17 (Counsel confer.)

18 MR. GOUTMAN: I'd like to show you a  
19 Exhibit 19, which is a paper that you cite  
20 in your report.

21 (Exhibit Rodenburg-19, two-page  
22 document entitled Determination of  
23 Polychlorinated Biphenyls Using Multiple  
24 Regression With Outlier Detection and  
25 Elimination, is marked for identification.)



1 Lisa A. Rodenburg, Ph.D.

2 MR. GOUTMAN: For the record, this  
3 is a paper by Burkhard, B-U-R-K-H-A-R-D,  
4 and Weininger, W-E-I-N-I-N-G-E-R, titled  
5 "Determination of Polychlorinated Biphenyls  
6 Using Multiple Regression With Outlier  
7 Detection and Elimination."

8 BY MR. GOUTMAN:

9 Q. And you're familiar with this  
10 article; right?

11 A. Yes.

12 Q. And just if you go to the second  
13 page, they're talking about COMSTAR; is that  
14 correct?

15 A. Yes.

16 Q. And that's a PMF program similar  
17 to the one that you use?

18 A. No, COMSTAR is different.

19 Q. It is a -- it is a method of PMF  
20 analysis; correct?

21 A. No, as I understand it, COMSTAR is  
22 more of a MLR, similar to MLR.

23 Q. It -- I understand. Okay. Fair  
24 enough.

25 But what it sets forth here, and

1 Lisa A. Rodenburg, Ph.D.

2 this is, again, a paper that you cited, it  
3 sets forth R2 values that the authors deem  
4 acceptable. And it says, and I'm quoting in  
5 the second page right here (indicating) --

6 A. Uh-huh.

7 Q. -- "From our experiences with  
8 COMSTAR, acceptable COMSTAR solutions are  
9 obtained when the following conditions occur:  
10 First, R2 for the analysis is greater than .9."

11 Is that what it says?

12 A. That's what it says.

13 Q. And right above that it says, the  
14 fourth table, Table 1, a turtle sample -- by  
15 the way, this is about analysis of PCBs;  
16 right?

17 A. Yes.

18 Q. "The fourth sample, a turtle  
19 sample, illustrates the behavior of COMSTAR  
20 with severely imperfect input data. For this  
21 sample, COMSTAR analysis failed, i.e., COMSTAR  
22 was unable to find a subset of PCB peaks which  
23 forms a self-consistent PCB population. This  
24 failure is shown by the smaller R2 value, 725";  
25 correct?

1 Lisa A. Rodenburg, Ph.D.

2 A. That is what it says.

3 Q. Now, I don't know if I asked you  
4 this, but these cutoffs that you include in  
5 this report, do they appear -- I think I asked  
6 you whether you've ever published in the  
7 peer-reviewed literature.

8 Have you ever seen it anywhere  
9 else in a study in a peer-reviewed journal?

10 A. No.

11 Q. The second criterion that you  
12 used, it says -- this is on Page 14 of your  
13 report, the second full paragraph.

14 A. Hold on. I lost my report. Is  
15 it -- yeah, here we go. Okay. What page?

16 Q. Page 14.

17 A. Okay.

18 Q. Second full paragraph, the second  
19 criteria is that -- I'm just quoting from your  
20 report -- is that, "When the agreement between  
21 Aroclor and the factor is less than .4, the  
22 differences between the Aroclor and the factor  
23 cannot be explained by any known weathering  
24 phenomenon."

25 Is that what it says?

1 Lisa A. Rodenburg, Ph.D.

2 Q. But it -- the reader of this  
3 report would not be able to tell what those  
4 byproduct congener concentrations are other  
5 than they're found in pigments other than 11  
6 and 209; correct?

7 A. Correct.

8 Q. And also you did not discuss  
9 congeners found in any of the other 200 or so  
10 products that might potentially contain  
11 byproduct PCBs that we discussed in Exhibit 8;  
12 correct?

13 A. I did discuss silicone.

14 Q. Other than silicone?

15 A. No, not other than silicone.

16 Q. And you did not discuss the  
17 likeness or unlike -- or, excuse me, the  
18 presence and concentration of PCBs --  
19 byproduct PCBs that are known to be generated  
20 by incineration?

21 A. Correct.

22 Q. So of the universe of byproduct  
23 congeners -- excuse me -- of products that may  
24 contain byproduct PCBs, you narrowed that  
25 universe essentially to pigments in silicone;

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2 right?

3 A. I would say that those are the two  
4 that I specifically considered.

5 Q. And -- and, in fact, with respect  
6 to pigments, you narrowed the universe from  
7 the dozens of congeners to two, 11 and 209;  
8 correct?

9 A. I'm sorry. Can you repeat that?

10 Q. With respect to just pigments, you  
11 narrowed the universe of congeners that are --  
12 number in the dozen, byproduct congeners that  
13 are in the dozens down to two, PCB-11 and 2 --  
14 209; correct?

15 A. Those are the two that I  
16 specifically reported.

17 Q. Why is blank correction important?

18 A. When you analyze samples for PCBs,  
19 you frequently find PCBs in the blanks, and so  
20 you need to correct that to account for the  
21 fact that PCBs are present in the blanks, that  
22 some of the PCBs that you measure in the  
23 sample might be there because of blank  
24 contamination in the lab or in the field.

25 Q. And you've referred to it in some

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2 mischaracterizes prior testimony, but you  
3 can answer.

4 THE WITNESS: Again, I don't  
5 remember the specifics.

6 BY MR. GOUTMAN:

7 Q. I would like to now turn to the  
8 MLR that you performed on data, leaving aside  
9 the MLR testing that you just told us about an  
10 hour or so ago that we weren't aware of, but  
11 the MLR data that -- the MLR data that you  
12 actually discuss in your report. Okay?

13 And once again, your report  
14 gives -- you're -- you're comparing the data,  
15 am I not correct, to known Aroclor patterns;  
16 correct?

17 A. Correct.

18 Q. And that would be 1016, 1242,  
19 1248, 1254, and 1260; right?

20 A. And as I mentioned in my errata,  
21 I -- I did a little bit with 1262 and 1268.

22 Q. We're going to get to that.

23 At least in this report you did  
24 not do 1262 and 1268; correct?

25 A. Correct.

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2 Q. And am I correct that in your MLR  
3 you did not compare the data to any byproduct  
4 patterns quantitatively; correct?

5 A. Correct.

6 Q. Am I correct then that, as a  
7 result, all you were finding out is the extent  
8 of the resemblance to Aroclor profiles and not  
9 the resemblance to byproduct profiles?

10 Correct?

11 A. Correct.

12 Q. And, again, you used the R2  
13 cutoffs that we discussed in some detail  
14 earlier; correct?

15 A. Well, I reported every R2 and then  
16 I, in my interpretation, I did follow those  
17 guideline cutoffs, yes.

18 Q. Okay. And once again, when you  
19 looked at whether there was a resemblance to  
20 byproduct PCBs, you limited your discussion to  
21 two of the congeners found in pigments,  
22 correct, PCB-11 and 209?

23 MR. LAND: Take your time to look  
24 through your report if you need to.

25 THE WITNESS: (Reviewing document.)

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2 BY MR. GOUTMAN:

3 Q. Okay. We've marked as Exhibit 37,  
4 your Errata and Supplement; is that correct?

5 A. Correct.

6 Q. And you state that -- well, you  
7 rehearse what you said in -- on Page 17 of  
8 your expert opinion, fingerprinting -- quote,  
9 Fingerprinting of PCB congener patterns in  
10 samples from Spokane, Washington area, and you  
11 noted that Stormwater 4 and Stormwater 5  
12 somewhat resembled Aroclors, et cetera; right?

13 A. Correct.

14 Q. And then you say that you actually  
15 meant Stormwater 3 when you refer to  
16 Stormwater 4 and you meant Stormwater 4 when  
17 you refer to Stormwater 5; right?

18 A. Correct.

19 Q. And you said, [As read]: "More  
20 importantly, since I wrote this testimony in  
21 the summer of 2019, I've become aware of a  
22 number of papers that discuss the uses of 1262  
23 and 1268."

24 Do you recall that?

25 A. Yes.



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2 Q. Am I correct that you were aware  
3 of 1262 and 1268 as commercial Aroclors well  
4 before the summer of 2019; correct?

5 A. Correct.

6 Q. And you were aware of -- and the  
7 papers that you cite, indeed, date as far back  
8 as 1997; right?

9 A. Correct.

10 Q. If you can get out Exhibit 15. I  
11 have an extra copy if that would be easier.

12 Page 33, and to reorient you or to  
13 clarify the record, this is the web --  
14 transcription of a webinar you gave on  
15 September 25, 2017; correct?

16 A. Yes.

17 Q. And on Page 33, beginning on  
18 Line 5, could you read in the record what you  
19 said during this --

20 A. "So here's" --

21 Q. -- educational seminar?

22 A. Sorry.

23 "So here's an example of what the  
24 different Aroclors look like, period. These  
25 are the four big ones. Remember, I mentioned

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2 that Aroclor 1016 looks a lot like Aroclor  
3 1242. So they're very similar. So I've  
4 lumped those together. And then there was  
5 Aroclor 1248, 1254, and 1260. So these five  
6 Aroclors made up 99 percent of all the U.S.  
7 production."

8 Q. Can you continue to read?

9 A. "There are a couple of others.  
10 There's Aroclor 1268 and 1260 -- 1272. But  
11 those are very, very minor, rarely used; not  
12 the kind of thing that you're typically going  
13 to run into when you're doing any kind of site  
14 assessment or thinking about PCBs."

15 Q. Okay. So what you did with the  
16 analysis is that you then introduced for the  
17 first time in any of your analyses that you've  
18 done in this case, two additional Aroclors,  
19 Aroclor 1262 and Aroclor 1268; is that  
20 correct?

21 A. Correct.

22 Q. And you got a higher R2 than you  
23 had before you had introduced those two  
24 Aroclors; correct?

25 A. Correct.

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2 Q. Are you aware of any facility in  
3 the City of Spokane that used commercial  
4 Aroclor 1262 or 1268?

5 A. No.

6 Q. Are you -- oh, you've -- you did  
7 say in this educational webinar in 2017 that  
8 the other Aroclors that you had previously  
9 included in your analysis comprised 99 percent  
10 of all U.S. production; correct?

11 A. Yes.

12 Q. And that the Aroclors -- the other  
13 Aroclors were very minor, rarely used;  
14 correct?

15 A. Correct.

16 Q. And, again, you have no  
17 information as to whether 1262 and 1268 were  
18 ever used in the Spokane Valley watershed;  
19 correct?

20 A. Correct.

21 MR. GOUTMAN: That's all I have.

22 Thank you.

23 MR. LAND: All right. I've got a  
24 quick redirect.

25 MR. GOUTMAN: I object.

1 Lisa A. Rodenburg, Ph.D.

2 CERTIFICATE

3 COMMONWEALTH OF PENNSYLVANIA )

4 ) ss:

5 COUNTY OF PHILADELPHIA )

6 I, Debra Sapio Lyons, a Registered  
7 Diplomat Reporter, a Certified Realtime Reporter,  
8 a Certified Realtime Captioner, an Approved  
9 Reporter of the United States District Court for  
10 the Eastern District of Pennsylvania, a Certified  
11 Court Reporter for the State of New Jersey; and  
12 Notary Public within and for the States of New  
13 Jersey, New York and the Commonwealth of  
14 Pennsylvania do hereby certify:

15 That Lisa A. Rodenburg, Ph.D., the  
16 witness whose deposition is hereinbefore set  
17 forth, was duly sworn by me and that such  
18 deposition is a true record of the testimony  
19 given by such witness, to the best of my ability  
20 and thereafter reduced to typewriting under my  
21 direction.

22 I further certify that I am not related  
23 to any of the parties to this action by blood or  
24 marriage and that I am in no way interested in  
25 the outcome of the matter.

In witness whereof, I have hereunto set  
my hand this 23rd day of December, 2019.



DEBRA SAPIO LYONS  
CRR, RDR, CRC, CCR, CPE

Lisa A. Rodenburg, Ph.D.

\* \* \*ERRATA SHEET\* \* \*

NAME OF CASE:

City of Spokane, a municipal corporation located  
in the County of Spokane, State of Washington

vs.

Monsanto Company, et al.

NAME OF WITNESS:

Lisa A. Rodenburg, Ph.D.

Reason codes:

1. To clarify the record.

2. To conform to the facts.

3. To correct transcription errors.

Page	Line	Reason
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Subscribed and sworn to before me  
this \_\_\_\_\_ day of \_\_\_\_\_, 2019.